

EPA Reg. No. 19713-600
Vol. 2

Adeeb, Shanta

From: Luz Chan <lchan@drexchem.com>
Sent: Friday, July 28, 2017 5:22 PM
To: Adeeb, Shanta
Cc: Scott Pace
Subject: FW: Label Amendment for EPA Reg. No. 19713-668

Shanta, good afternoon.

It was decided here that we will withdraw the submission for 19713-600 (Tech) and 19713-668 (EUP) resubmit the same with a fee required for PRIA action R352.

I'll submit on Monday next week.

Thank you,

Luz

From: Luz Chan
Sent: Thursday, July 27, 2017 1:11 PM
To: 'Adeeb, Shanta' <Adeeb.Shanta@epa.gov>
Subject: RE: Label Amendment for EPA Reg. No. 19713-668

Thanks, Shanta. I'll pass this on and let them decide how to proceed.

I will let you know when I hear back.

Thanks you,

Luz

From: Adeeb, Shanta [mailto:Adeeb.Shanta@epa.gov]
Sent: Thursday, July 27, 2017 12:37 PM
To: Luz Chan <lchan@drexchem.com>
Subject: RE: Label Amendment for EPA Reg. No. 19713-668

That is correct.

From: Luz Chan [mailto:lchan@drexchem.com]
Sent: Thursday, July 27, 2017 11:52 AM
To: Adeeb, Shanta <Adeeb.Shanta@epa.gov>
Cc: Scott Pace <splace@drexchem.com>
Subject: RE: Label Amendment for EPA Reg. No. 19713-668

Shanta,

I left you a VM.

You mentioned earlier that if we do use a cite all method of support, then, the submission will not be covered under a PRIA action. All I need to do is submit a revised data matrix and certification with respect to citation of data.

Scott want you to please confirm.

Thank you,

Luz

From: Adeeb, Shanta [mailto:Adeeb.Shanta@epa.gov]
Sent: Thursday, July 27, 2017 9:06 AM

To: Luz Chan <lchan@drexchem.com>

Subject: RE: Label Amendment for EPA Reg. No. 19713-668

Hi Luz,

I accidentally give you the wrong PRIA category. This action with selective citing actually is an R352 <https://www.epa.gov/pria-fees/r352-pria-fee-category>. Since it is PRIA you will need to resubmit the packages with the PRIA fee so that it can get the proper front end screen. You would also need to withdraw these amendments or we will reject them since they do not qualify as label amendments.

Feel free to contact me if you have any questions.

Shanta

From: Luz Chan [mailto:lchan@drexchem.com]

Sent: Thursday, July 27, 2017 9:53 AM

To: Adeeb, Shanta <Adeeb.Shanta@epa.gov>

Cc: Scott Pace <space@drexchem.com>

Subject: FW: Label Amendment for EPA Reg. No. 19713-668

Shanta:

Per your call this morning, please find the label for 19713-600 as well.

We are maintaining the current selective citation method of support for this action.

Is it possible for the Agency to just sent us a letter stating that this action falls under PRIA Code R340 and then we can just submit the payment, instead of resubmitting?

Thank you so much,

Luz

From: Luz Chan

Sent: Thursday, July 27, 2017 8:28 AM

To: 'Adeeb, Shanta' <Adeeb.Shanta@epa.gov>

Subject: RE: Label Amendment for EPA Reg. No. 19713-668

Shanta, good morning to you.

Here is the label.

If you need anything further, just kindly let me know.

Thank you as always,

Luz

From: Adeeb, Shanta [mailto:Adeeb.Shanta@epa.gov]

Sent: Thursday, July 27, 2017 8:20 AM

To: Luz Chan <lchan@drexchem.com>

Subject: Label Amendment for EPA Reg. No. 19713-668

Hi Luz,

Can you please send me a pdf of the label you submitted 6/28/2017?

Shanta Adeeb, M.S.
Risk Manager
Herbicide Branch
Registration Division



Drexel Chemical Company

June 28, 2017

Document Processing Desk (**AMEND**)
ATTN: MR. REUBEN BARIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

Re: *Submission of Revised Label Adding Crops*
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)

Dear Mr. Baris,

We kindly withdraw the label amendment submission that we made on June 26, 2017 adding Alfalfa and Wheat on Drexel Pendimethalin Technical (19713-600) and request that it be replaced by this submission that includes the submission of the amended label for our end-use product, Pin-Dee 3.3 EC (19713-668) adding Alfalfa and Wheat uses as well.

Enclosed, please find:

1. Completed EPA Form 8570-1
2. Copy of the label currently accepted by the Agency for the above product with the marked up changes.
3. Three copies (one is marked up) of the Technical label (600SP-0617*Pending) adding Alfalfa and Wheat.
4. Certification with Respect to Citation of Data
5. Data Matrix

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐
☒
☐

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 241-245 Product Name Pendimethalin Technical	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This submission replaces the submission we made on June 26, 2017 for this product. Details are in the cover letter accompanying this submission. In conjunction with this submission, amended label for the end-use product, Pin-Dee 3.3 EC (19713-668) is also submitted adding Alfalfa and Wheat use directions. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input checked="" type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	<input checked="" type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) Polywoven bag	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container < 50 lbs; 50 lbs. & greater		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Luz G Chan		Title Registration Manager	
		Telephone No. (Include Area Code; (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager	
4. Typed Name Luz G Chan		5. Date 06/28/2017	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-600
Active Ingredient(s) and/or representative test compound(s) Pendimethalin	Date 06/28/2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial non-food crops	Product Name DREXEL PENDIMETHALIN TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Adding crops to the label.

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 06/28/2017	Typed or Printed Name and Title SCOTT PACE, Director of Registration Division
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WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 06/28/2017			EPA Reg No./File Symbol 19713-600		Page 1 of 2
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
121-1	Target Area Phytotoxicity	00106792	BASF Corporation	Old	
165-1	Confined Rotational Crop	41806801	BASF Corporation	Old	
		43918601	BASF Corporation	Old	
171-4A	Nature of Residue, Plant	00108317	BASF Corporation	Old	
171-4B	Nature of Residue, Livestock	00023780	BASF Corporation	Old	
		00046286	BASF Corporation	Old	
		00074620	BASF Corporation	Old	
		00106830	BASF Corporation	Old	
		41982701	BASF Corporation	Old	
		42266307	BASF Corporation	Old	
		42859203	BASF Corporation	Old	
		43068501	BASF Corporation	Old	
		43147801	BASF Corporation	Old	
171-4C	Residue Analytical Method, Plant	00056133	BASF Corporation	Old	
		00097501	BASF Corporation	Old	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 06/28/2017



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Date 06/28/2017	EPA Reg No./File Symbol 19713-600	Page 2 of 2
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327	Product DREXEL PENDIMETHALIN TECHNICAL	

[illegible]

Signature	Name and Title	Date
	Scott Pace, Director of Registration Division	06/28/2017



Drexel Chemical Company

June 26, 2017

Document Processing Desk (**AMEND**)
ATTN: MR. REUBEN BARIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

Re: Submission of Revised Label Adding Crops
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)

Dear Mr. Baris,

Drexel would like to submit a revised label adding two use sites currently approved by the Agency for Pendimethalin Technical labels.

Enclosed, please find:

1. Completed EPA Form 8570-1
2. Copy of the label currently accepted by the Agency for the above product.
3. Three copies (one is marked up) of the label (600SP-0617*Pending) with the added uses.
4. Certification with Respect to Citation of Data
5. Data Matrix

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 241-245 Product Name Pendimethalin Technical	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label adding Alfalfa and Wheat which are currently approved by the Agency. Details are in the cover letter accompanying this submission. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input checked="" type="checkbox"/> Plastic	
				<input checked="" type="checkbox"/> Glass	
If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input checked="" type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) Polywoven bag	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container < 50 lbs; 50 lbs. & greater		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Luz G Chan		Title Registration Manager		Telephone No. (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Registration Manager			
4. Typed Name Luz G Chan		5. Date 06/26/2017			



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WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-600
Active Ingredient(s) and/or representative test compound(s) Pendimethalin	Date 06/26/2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial non-food crops	Product Name DREXEL PENDIMETHALIN TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Adding crops to the label.

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 06/26/2017	Typed or Printed Name and Title SCOTT PACE, Director of Registration Division
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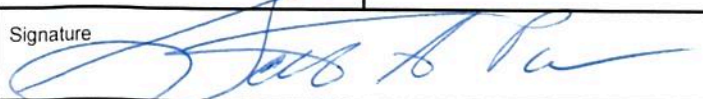


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Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 06/26/2017			EPA Reg No./File Symbol 19713-600		Page 1 of 2
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
121-1	Target Area Phytotoxicity	00106792	BASF Corporation	Old	
165-1	Confined Rotational Crop	41806801	BASF Corporation	Old	
		43918601	BASF Corporation	Old	
171-4A	Nature of Residue, Plant	00108317	BASF Corporation	Old	
171-4B	Nature of Residue, Livestock	00023780	BASF Corporation	Old	
		00046286	BASF Corporation	Old	
		00074620	BASF Corporation	Old	
		00106830	BASF Corporation	Old	
		41982701	BASF Corporation	Old	
		42266307	BASF Corporation	Old	
		42859203	BASF Corporation	Old	
		43068501	BASF Corporation	Old	
		43147801	BASF Corporation	Old	
171-4C	Residue Analytical Method, Plant	00056133	BASF Corporation	Old	
		00097501	BASF Corporation	Old	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 06/26/2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 9, 2017

Luz G. Chan
Registration Manager
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

Subject: Label Amendment – Adding use sites to the label
Product Name: Drexel Pendimethalin Technical
EPA Registration Number: 19713-600
Application Date: January 12, 2017
Decision Number: 525625

Dear Ms. Chan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2
EPA Reg. No. 19713-600
Decision No. 525625

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Emily Schmid by phone at 703-347-0189, or via email at schmid.emily@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Reuben Baris", with a stylized flourish at the end.

Reuben Baris, Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Drexel

Pendimethalin Technical

Herbicide

For manufacturing use only.

ACTIVE INGREDIENT:

Pendimethalin..... 96.0%

OTHER INGREDIENTS:..... 4.0%

TOTAL:100.0%

Contains nitrosoamines at levels less than 100 ppm.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See FIRST AID Below

ACCEPTED

06/09/2017

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 19713-600

EPA Reg. No. 19713-600

EPA Est. No. XXXXX-XX-XXX

Net Content: _____ Lbs. (_____ Kg)

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call CHEMTREC at 800-424-9300 for emergency medical information.

600SP-0217*P

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Wash hands thoroughly with soap and water after handling and before eating, drinking, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

ATTENTION

Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or residues.

Continue to observe all precautions on label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Each formulator is responsible for obtaining EPA registration for their formulated product(s).

1. Only for formulation into a herbicide for the following uses:

Artichoke; Asparagus; Beans (Edible); Bermuda grass and other Perennial warm season grasses; Brassica head and stem vegetables; Brassica leafy greens; Bushberry (Sub-group 13-07B); Caneberry (Sub-group 13-07A); Carrots; Carrots grown for seed; Christmas trees; Citrus fruit (Crop Group 10-10); Corn (Field, Field seed, Pop, Pop seed, Sweet); Cotton; Edamame, Fallow; Forage Legumes (Except Alfalfa); Fruiting vegetables (Crop Group 8-10); Fruits, Nut crops and Vineyards (Non-bearing); Garlic; Grapes; Grass Forage / Fodder / Hay (Crop Group 17); Grasses grown for seed; Farmsteads; Juneberry; Landscape or Ground maintenance; Hops; Lentils; Lettuce (Leaf); Lupines (Sweet); Low growing berry (Sub-group 13-07G); Melons; Mint; Non-cropland areas; Olives (Bearing, Non-bearing); Ornamentals; Onions (Dry Bulb) (Sub-group 3-07A); Onions (Green) (Sub-Group 3-07B); Peanuts; Peas; Pome fruits (Crop Group 11-10); Pomegranate; Potatoes; Rice; Soybeans; Sorghum (Grain); Stone fruits (Crop Group 12-12); Sugarcane; Sunflowers (and other Group 20B oilseeds); Tobacco; Tree nuts (Crop Group 14-12); Turf grasses; Turnip greens; Vine climbing small fruits.

2. This product may be used to formulate products for use(s) for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
3. This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).
4. Uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved disposal facility.

CONTAINER HANDLING:

Nonrefillable Container (Flexible-bag—all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (Rigid—Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use but neither this warranty, nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE expressed or implied extends to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such use. To the extent consistent with applicable law, Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

Manufactured For:



The Drexel logo is a registered trademark of Drexel Chemical Company.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70506-246; 241-245; 68156-5 Product Name UPI Technical Pendimethalin; Pendimethalin Technical	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label adding various use sites currently approved by the Agency. Details are in the cover letter accompanying this submission. Thank you.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Polywoven bag		
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container < 50 lbs; 50 lbs. & greater		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Luz G Chan		Title Registration Manager	
		Telephone No. (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamp)
2. Signature 		3. Title Registration Manager	
4. Typed Name Luz G Chan		5. Date 02/14/2017	



Drexel Chemical Company

February 14, 2017

Document Processing Desk (**AMEND**)
ATTN: MR. REUBEN BARIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

***Re: Amendment Submission Dated 1/12/2017 – Submission of Corrected Label
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)***

Dear Mr. Baris,

Further to our 1/12/2017 amendment submission to add currently approved uses to Drexel Pendimethalin Technical label, we kindly request replacing the label submitted on 1/12/2017 with the enclosed label. I inadvertently left off one use site, i.e., "Forage Legumes (Except Alfalfa)" on the label submitted on 1/12/2017 and would like to correct the said label. This submission remains supported by a "CITE ALL" method of support.

Please find:

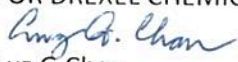
1. Completed EPA Form 8570-1
2. Three copies (one is marked up) of the corrected label (600SP-0217*P) with the above said use.

My sincere apologies to you and your team for any inconvenience this could have caused.

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327
Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: info@drexchem.com • www.DrexChem.com

SINCE 1972

resubmission

Schmid, Emily

From: Luz Chan <lchan@drexchem.com>
Sent: Friday, May 26, 2017 4:34 PM
To: Schmid, Emily
Subject: FW: Label Amendment (EPA Reg. No. 19713-600)
Attachments: 019713-00600.20170426 with ES comments.pdf; 019713-00600.20170526 .pdf; 019713-00600.20170526 .pdf

Emily, thank you again.

Here is the revised label, marked and clean. (If you don't mind, I qualified the CHEMTREC referral statement.)

If you need anything else on this, just please let me know.

Thanks again,

Luz

From: Schmid, Emily [mailto:Schmid.Emily@epa.gov]
Sent: Friday, May 26, 2017 1:24 PM
To: Luz Chan <lchan@drexchem.com>
Subject: RE: Label Amendment (EPA Reg. No. 19713-600)

Hi Luz,

I have attached a pdf of the label with my comments. Let me know if you have any questions.

Best regards,

Emily

From: Luz Chan [mailto:lchan@drexchem.com]
Sent: Wednesday, April 26, 2017 2:08 PM
To: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: Label Amendment (EPA Reg. No. 19713-600)

Hi, Emily.

Here is the data matrix that included the product specific data.

Thanks,

Luz

From: Schmid, Emily [mailto:Schmid.Emily@epa.gov]
Sent: Tuesday, April 25, 2017 12:06 PM
To: Luz Chan <lchan@drexchem.com>
Subject: RE: Label Amendment (EPA Reg. No. 19713-600)

Hi Luz,

Could you also email me a revised data matrix including the product specific data?

Thanks,

Emily

From: Schmid, Emily
Sent: Tuesday, April 25, 2017 12:58 PM
To: 'Luz Chan' <lchan@drexchem.com>
Subject: Label Amendment (EPA Reg. No. 19713-600)

Hi Luz,

I am in the process of reviewing the label amendment you submitted for Drexel Pendimethalin Technical (EPA Reg. No. 19713-600). Could you email a pdf of the label to me?

Thank you,

Emily Schmid
Biologist
U.S. Environmental Protection Agency
Registration Division
Herbicide Branch

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resubmission

Schmid, Emily

From: Luz Chan <lchan@drexchem.com>
Sent: Wednesday, April 26, 2017 2:08 PM
To: Schmid, Emily
Subject: RE: Label Amendment (EPA Reg. No. 19713-600)
Attachments: 17-4-26 DataMatrix Signed.pdf

Hi, Emily.
Here is the data matrix that included the product specific data.
Thanks,
Luz

From: Schmid, Emily [mailto:Schmid.Emily@epa.gov]
Sent: Tuesday, April 25, 2017 12:06 PM
To: Luz Chan <lchan@drexchem.com>
Subject: RE: Label Amendment (EPA Reg. No. 19713-600)

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Sent: Tuesday, April 25, 2017 12:58 PM
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Subject: Label Amendment (EPA Reg. No. 19713-600)

Hi Luz,

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Thank you,

Emily Schmid
Biologist
U.S. Environmental Protection Agency
Registration Division
Herbicide Branch

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 17, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

LUZ G. CHAN
DREXEL CHEMICAL COMPANY
PO Box 13327
MEMPHIS, TN 38113-0327

PRODUCT NAME: DREXEL PENDIMETHALIN TECHNICAL
COMPANY NAME: DREXEL CHEMICAL COMPANY
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 19713-600
EPA RECEIPT DATE: 02/16/17

SUBJECT: RECEIPT OF AMENDMENT

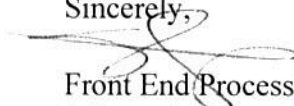
DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 305-7356.

Sincerely,


Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Fee for Service

{999104&~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S-

999104

EPA File Symbol/Reg. No.

19713-600

Pin-Punch Date:

2/16/2017



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: Cathryn Britton

Date: 2/17/17

Remarks:



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401 M Street, S.W.
WASHINGTON, D.C. 20460

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26

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DATA MATRIX

Date 04/26/2017

EPA Reg No./File Symbol 19713-600

Page 1 of 7

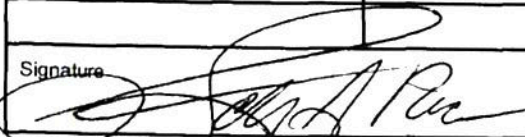
Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL PENDIMETHALIN TECHNICAL

Ingredient Pendimethalin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
-	-	-	-	-	
GENERIC DATA:		-	-	-	
Cite all	Cite all	Cite all	BASF Corporation	Pay	
			Bayer CropScience	Pay	
			FMC Corp. Agricultural Products Group	Pay	
			E.I. Du Pont de Nemours	Pay	
			Scotts Company	Pay	
			Southern States Cooperative, Inc.	Pay	
			Lesco, Inc.	Pay	
Signature 				Name and Title Scott Pace, Director of Registration Division	Date 04/26/2017



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Date 04/26/2017 EPA Reg No./File Symbol 19713-600 Page 2 of 7

Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL PENDIMETHALIN TECHNICAL

Ingredient Pendimethalin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			The Anderson Lawn Fertilizer Division	Pay	
			United Suppliers, Inc.	Pay	
			Loveland Products	Pay	
			Howard Fertilizer & Chemical Co.	Pay	
			Harrell's LLC	Pay	
			Control Solutions, Inc.	Pay	
			Cedar Chemical Corp.	Pay	
			Everris NA, Inc.	Pay	
			Repar Corporation	Pay	
			United Phosphorus, Inc	Pay	
			Spray Drift Task Force	Own	
			Outdoor Residential Exposure Task Force	Own	
			Agricultural Reentry Task Force	Own	
			Generic Endangered Species Task Force	Own	
			Residential Exposure Joint Venture Task Force	Pay	

Signature

Name and Title

Scott Pace, Director of Registration Division

Date

04/26/2017



28

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DATA MATRIX

Date 04/26/2017

EPA Reg No./File Symbol 19713-600

Page 3 of 7

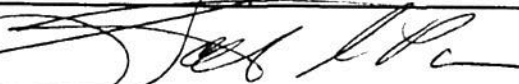
Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL PENDIMETHALIN TECHNICAL

Ingredient	Pendimethalin
------------	---------------

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agricultural Handler Exposure Task Force	Own	
			RiceCo LLC	Pay	
			Croplife America	Pay	
			FIFRA Endangered Task Force	Pay	
			BASF Corporation Agricultural Products	Pay	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 04/26/2017

EPA Form 8870-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy




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DATA MATRIX

Date 04/26/2017			EPA Reg No./File Symbol 19713-600		Page 4 of 7
Applicant's/Registrant's Name & Address DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327			Product DREXEL PENDIMETHALIN TECHNICAL		
Ingredient Pendimethalin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data:					
830.1550	Product identity and composition	46861301; 49348701	Drexel Chemical Company	Own	
830.1600	Description of materials used to produce the product	46861301; 49348701	Drexel Chemical Company	Own	
830.1620	Description of production process	46861301; 49348701	Drexel Chemical Company	Own	
830.1650	Description of Formulation Process	-	-	-	1
830.1670	Discussion of formation of impurities	46861301; 49348701	Drexel Chemical Company	Own	
830.1700	Preliminary analysis	46861301; 49348701	Drexel Chemical Company	Own	
830.1750	Certified Limits	46861301; 49348701	Drexel Chemical Company	Own	
830.1800	Enforcement analytical method	46861301; 49348701	Drexel Chemical Company	Own	
830.1900	Submittal of samples	-	-	-	2
830.6302	Color	46861302	Drexel Chemical Company	Own	
830.6303	Physical state	46861302	Drexel Chemical Company	Own	
830.6304	Odor	46861302	Drexel Chemical Company	Own	
830.6313	Stability to normal & elevated temp., metal, metal ions	46861302	Drexel Chemical Company	Own	
830.6314	Oxidation/Reduction Reaction	46861302	Drexel Chemical Company	Own	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 04/26/2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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EPA Reg No./File Symbol 19713-600

Page 5 of 7


Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL PENDIMETHALIN TECHNICAL

Ingredient Pendimethalin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability	46861302	Drexel Chemical Company	Own	
830.6316	Explosibility	46861302	Drexel Chemical Company	Own	
830.6317	Storage stability	46861302	Drexel Chemical Company	Own	
830.6319	Miscibility	46861302	Drexel Chemical Company	Own	
830.6320	Corrosion characteristics	46861302	Drexel Chemical Company	Own	
830.6321	Dielectric breakdown voltage	46861302	Drexel Chemical Company	Own	
830.7000	pH	46861302	Drexel Chemical Company	Own	
830.7050	UV/Visible absorption	-	-	-	3
830.7100	Viscosity	46861302	Drexel Chemical Company	Own	
830.7200	Melting point	46861302	Drexel Chemical Company	Own	
830.7220	Boiling point	46861302	Drexel Chemical Company	Own	
830.7300	Density/Relative Density/Bulk Density	46861302	Drexel Chemical Company	Own	
830.7370	Dissociation constants in water	46861302	Drexel Chemical Company	Own	
830.7550	Partition coefficient	46861302	Drexel Chemical Company	Own	
-	-	-	-	-	
Signature 			Name and Title Scott Pace, Director of Registration Division		Date 04/26/2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 04/26/2017

EPA Reg No./File Symbol 19713-600

Page 6 of 7

Applicant's/Registrant's Name & Address

DREXEL CHEMICAL COMPANY, P.O. BOX 13327, MEMPHIS, TN 38113-0327

Product

DREXEL PENDIMETHALIN TECHNICAL

Ingredient	Pendimethalin
------------	---------------

[illegible]

Signature

Name and Title

Scott Pace, Director of Registration Division

Date _____

04/26/2017

DATA MATRIX NOTES

- 1 **Description of Formulation Process:** Not applicable because product is a TGA/MP.
- 2 **Submittal of Samples:** Not required at this time.
- 3 **UV Visible Absorption:** Drexel is citing the UV-VIS data e-mailed by our staff, Ms. Kedra Wherry, to Dr. Shyam Mathur on December 18, 2006 for Drexel Pendimethalin Technical (Reg. No. 19713-600). The Agency then granted the Notice of Registration for Drexel Pendimethalin Technical on December 27, 2006.

A handwritten signature in black ink, appearing to be "J. A. M.", is located at the bottom left of the page. The signature is fluid and cursive, with a large loop at the beginning and a horizontal line extending to the right.

FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Expert's In-Processing Signature: L. Pachel

Date: 1/26/17 PM #: 25

EPA Reg. Number: <u>19713-600</u>		EPA Receipt Date: <u>1/18/17</u>		
	Checklist Item	Yes	No	N/A
1	Application Form (EPA Form 8570-1) - signed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Certification with Respect to Citation of Data (EPA Form 8570-34) - signed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	a) Selective Method?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Cite-All Method?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Public copy of Matrix provided? See PR Notice 98-5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Is Label included? (5 copies)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	a) Electronic Label submitted?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments: <u>adding me-too uses</u></p> <p><i>Emdy</i></p>				

S: 997715

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Amendment

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 19713 DREXEL CHEMICAL COMPANY

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 25

Product #: 19713-600

Product Name: DREXEL PENDIMETHALIN TECHNICAL

Override#:

Me Too

Section3:

Me Too Product

Name:

Application Date: 12-Jan-2017

OPP Rec'd Date: 18-Jan-2017

Front End Date: 18-Jan-2017

Risk Manager Send Date: 23-Jan-2017

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

LABEL AMENDMENT

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

Paper Label

View/Edit

S: 999104	Milestone Email:	
Regulatory Type: Product Registration - Section 3	Resubmission: <input checked="" type="radio"/> Yes <input type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>
Application Type: Amendment	Fee For Service: <input type="radio"/> Yes <input checked="" type="radio"/> No	
Company: 19713 DREXEL CHEMICAL COMPANY	Billable: <input type="radio"/> Yes <input checked="" type="radio"/> No	
Risk Manager: Registration Division, Risk Management Team 25		
Product #: 19713-600	Product Name: DREXEL PENDIMETHALIN TECHNICAL	
Override#:		
Me Too Section3:	Me Too Product Name:	
Application Date: 14-Feb-2017	OPP Rec'd Date: 16-Feb-2017	<div>Receipt Content</div> <div>Paper Label</div> <div>View/Edit</div>
Front End Date: 16-Feb-2017	Risk Manager Send Date: 17-Feb-2017	
FFS Due Date:	Negotiated Due Date:	
OPP Target Date:		
Fast Track: <input type="checkbox"/>	New Ingredient: <input type="checkbox"/>	
Receipt Description: LABEL AMENDMENT		
Form A: <input type="checkbox"/>	Signature Date:	
Form B: <input type="checkbox"/>	Signature Date:	

Resub

Resubmission
to 1/12/17
Submission.
corrected label.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 23, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

LUZ G. CHAN
DREXEL CHEMICAL COMPANY
PO Box 13327
MEMPHIS, TN 38113-0327

PRODUCT NAME: DREXEL PENDIMETHALIN TECHNICAL
COMPANY NAME: DREXEL CHEMICAL COMPANY
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 19713-600
EPA RECEIPT DATE: 01/18/17

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 305-7356.

Sincerely,

Front-End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Fee for Service

{997715C~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S-

997715

EPA File Symbol/Reg. No.

19713-600

Pin-Punch Date:

1/18/2017



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer:

Dee Colby

Date:

23-Jan-2017

Remarks:



United States
Environmental Protection Agency
Washington, DC 20460

☐ **Registration**
☒ **Amendment**
☐ **Other**

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-600	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PENDIMETHALIN TECHNICAL	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>70506-246; 241-245</u> Product Name <u>UPI Technical Pendimethalin; Pendimethalin Technical</u>	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label adding various use sites currently approved by the Agency. Details are in the cover letter accompanying this submission. Thank you.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>Polywoven bag</u>		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container _____ < 50 lbs; 50 lbs. & greater		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Luz G Chan	Title Registration Manager	Telephone No. (Include Area Code) (901) 774-4370	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamp)
2. Signature 	3. Title Registration Manager		
4. Typed Name Luz G Chan	5. Date 01/12/2017		



Drexel Chemical Company

January 12, 2017

"EXPEDITED REVIEW"

Document Processing Desk (AMEND)
ATTN: MR. REUBEN BARIS, PM 25
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202

***Re: Submission of Revised Label Adding Currently Approved Uses to the Label
DREXEL PENDIMETHALIN TECHNICAL (EPA Reg. No. 19713-600)***

Dear Mr. Baris,

Drexel would like to submit a revised label adding uses currently approved by the Agency for pendimethalin to match EPA Reg. No. 70506-246 and EPA Reg. No. 241-245.

Enclosed, please find:

1. Completed EPA Form 8570-1
2. Three copies (one is marked up) of the label (600SP-0117*P) with the added uses.
3. Certification with Respect to Citation of Data
4. Data Matrix

If you have questions/clarification or need anything further regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Drexel Chemical Company, P.O. Box 13327, Memphis, TN 38113-0327 (Tel 901 774-4370)	EPA Registration Number/File Symbol 19713-600
Active Ingredient(s) and/or representative test compound(s) Pendimethalin	Date 01/11/2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food and non-food crops	Product Name DREXEL PENDIMETHALIN TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

Adding use sites to the label

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
---	--

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

01/11/2017

Typed or Printed Name and Title

SCOTT PACE, Director of Registration Division